

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

PAUL POGUE and)
PAUL POGUE, in his capacity as owner of)
SURVEYORS' PARK,)

Plaintiffs,)

v.)

TONY CHANDLER, et al.,)

Defendants.)

CIVIL ACTION NUMBER

2:-06-cv-148-MHT

**DEFENDANTS' FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS**

Come now Defendants Tony Chandler and Danny Clark and request the Plaintiff to produce and permit the Defendants' attorneys to inspect and copy the documents described below in the time and manner provided by Rule 34 of the Federal Rules of Civil Procedure:

1. All deeds, contracts, agreements, tax notices, bills of sale, leases, wills or other documents which indicate whether you have an ownership interest in any property, real or personal, at issue in this complaint.

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2. All correspondence between yourself and any employee of the Alabama Forestry Commission relating to any claim that timber was unlawfully or improperly removed from the property at issue, whether such correspondence was originated by yourself or an employee of the Alabama Forestry Commission.
3. All correspondence between yourself and any other agency or individual concerning any claim that timber was unlawfully or improperly removed from the property at issue.
4. All correspondence between yourself and any employee or representative of International Paper Company, Cherokee Timber Company and any other corporation, firm or business regarding the removal of timber from the property at issue or the investigation thereof.
5. All correspondence between yourself and Todd Slusher, Mark Kynard, Jimmy Ingram, and any other individuals regarding the removal of timber from the property at issue or the investigation thereof.
6. All contracts or agreements between yourself and any company, firm, or individual regarding the removal of timber from the property at

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issue.

7. All deposit slips, bank statements, or other records which would show that you received payment for the removal of timber from the property at issue.
8. All documents related to any request made by you or on your behalf for the Alabama Forestry Commission or its agents to conduct an investigation.
9. All documents related to any services provided by you, by the Alabama Constitutional Institute, or by any organization you work for, where such services were related to the Alabama Forestry Commission.
10. All documents supporting your contention that the defendants discriminated against you, or any other person, on the basis of race.
11. Each and every document not covered in paragraphs 1 – 10 above which would support your claims against the Defendants.

The Plaintiff is requested to notify the Defendants of a time and place the above-referenced documents may be inspected and copied. Alternatively, the Plaintiff may notify the undersigned counsel for the Defendants that the documents are ready for inspection and may produce them for copying at said counsel's office.

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A handwritten signature in cursive script, appearing to read "Charles T. Conway".

Charles T. Conway - CON029

Attorney for Defendants Chandler and Clark

P.O. Box 302550

Montgomery, Alabama 36130

Telephone: (334) 240-9342

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CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing on the
Defendant on this the 21st day of August, 2006, by placing same in the United States
Mail, first class postage prepaid and properly addressed as follows:

Mr. Paul Pogue
301 Kahn Street
The Mays Building
Montgomery, Alabama 36104


Charles T. Conway
